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SCOTT ELLIOTT

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May 7, 2015

**VIA E-FILING**

Ms. Jocelyn Boyd  
Chief Clerk of the Commission  
SC Public Service Commission  
P. O. Drawer 11649  
Columbia, SC 29211

RE: Petition of South Carolina Electric & Gas Company for Updates and Revisions to  
Schedules Related to the Construction of a Nuclear Base Load Generation Facility at  
Jenkinsville, South Carolina  
Docket No. 2015-103-E

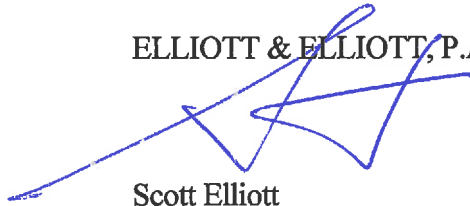
Dear Ms. Boyd:

Enclosed please find for filing a Petition to Intervene filed on behalf of the South Carolina Energy Users Committee ("SCEUC") in the above-captioned matter. By copy of this letter, I am serving all parties of record.

If you have questions, please do not hesitate to contact me.

Sincerely,

ELLIOTT & ELLIOTT, P.A.



Scott Elliott

SE/lbk

Enclosure

cc: All parties of record (w/encl.)

**STATE OF SOUTH CAROLINA**  
**BEFORE THE PUBLIC SERVICE COMMISSION**  
**DOCKET NO. 2015-103-E**

IN THE MATTER OF:

Petition of South Carolina Electric & Gas  
Company for Updates and Revisions to  
Schedules Related to the Construction of a  
Nuclear Base Load Generation Facility at  
Jenkinsville, South Carolina

**PETITION TO INTERVENE**

The South Carolina Energy Users Committee ("SCEUC") hereby petitions the South Carolina Public Service Commission ("Commission") pursuant to R.103-825 of the Commission's rules and regulations to intervene and be made a party of record in the above-captioned docket. In support of this Petition, SCEUC would allege as follows:

1. That on March 12, 2015, South Carolina Electric & Gas ("SCE&G") filed a petition with the Commission, pursuant to S.C. Code Ann. §58-33-270(E), seeking an order approving an updated construction schedule and capital cost schedule for the Units. The updated construction schedule reflects new substantial completions dates for Units 2 and 3 of June 19, 2019, and June 16, 2020, respectively. It also incorporates in the construction cost schedules approximately \$698 million in additional capital costs that have been identified since the issuance of Order No. 2012-884.

2. That SCEUC is an association organized in the State of South Carolina, consisting of large industrial consumers of energy which are engaged in various manufacturing enterprises throughout the State.

3. That a number of members of SCEUC purchase and consume substantial amounts of electricity from SCE&G.

4. That SCEUC and its members have a direct and material interest in the issues to be addressed and resolved by the Commission in this docket and the interests of its members are not adequately represented by the current parties to this proceeding.

5. That given the state of the record at this stage of the proceedings, SCEUC lacks sufficient information to fully develop and state its position in this proceeding at this time.

6. That granting SCEUC's request to be made a party of record in this proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it, and should be allowed so that a full and complete record addressing its views and concerns can be developed.

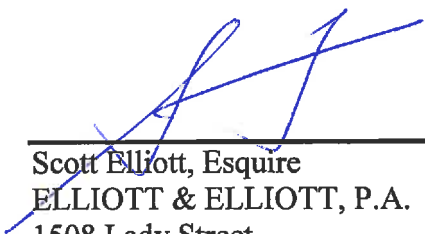
7. That Petitioner is represented by counsel in this proceeding as follows:



Scott Elliott, Esquire  
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Columbia, South Carolina 29201  
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**sellott@elliottlaw.us**

WHEREFORE, Petitioner prays for the following relief:

- a. That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- b. That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- c. For such other and further relief as is just and proper.



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Scott Elliott, Esquire  
ELLIOTT & ELLIOTT, P.A.  
1508 Lady Street  
Columbia, SC 29201  
(803) 771-0555

*Attorney for the South Carolina Energy  
Users Committee*



Columbia, South Carolina

May 7, 2015

## **CERTIFICATE OF SERVICE**

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that (s)he has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE:                                      Petition of South Carolina Electric & Gas Company for  
Updates and Revisions to Schedules Related to the  
Construction of a Nuclear Base Load Generation Facility at  
Jenkinsville, South Carolina

Docket No.:                              2015-103-E

PARTIES SERVED:                      Jeffrey M. Nelson, Esquire  
Shannon B. Hudson, Esquire  
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PLEADING:                              PETITION TO INTERVENE BY SOUTH CAROLINA  
ENERGY USERS COMMITTEE

May 7, 2015

  
Linda B. Kitchens, Paralegal